IN THE UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

SLABBED NEW MEDIA, LLC

Debtor

CHAPTER 11 CASE NO. 15-50963-KMS

CERTIFICATE OF SERVICE

I, Craig M. Geno, do hereby certify that I have caused to be served this date, via email transmission and/or U.S. Mail, postage prepaid, a true and correct copy of the *Motion to Extend Debtor's Time to Remove Causes of Action* (the "Motion") and the *Notice* in connection therewith (copies of which are attached hereto as collective **Exhibit "A"**) to all creditors and parties-in-interest as listed on the matrix on file with the Clerk of the Court (a copy of which is attached hereto as **Exhibit "B"**).

THIS, the ____day of August, 2015.

Craig M. Geno

OF COUNSEL:

Craig M. Geno; MSB No. 4793
Jarret P. Nichols; MSB No. 99426
LAW OFFICES OF CRAIG M. GENO, PLLC
587 Highland Colony Parkway
Ridgeland, MS 39157
601-427-0048 - Telephone
601-427-0050 - Facsimile
cmgeno@cmgenolaw.com
jnichols@cmgenolaw.com

IN THE UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

SLABBED NEW MEDIA, LLC

Debtor

CHAPTER 11

CASE NO. 15-50963-KMS

NOTICE

PLEASE TAKE NOTICE that Slabbed New Media, LLC (the "Debtor") has filed a *Motion* to Extend Debtor's Time to Remove Causes of Action (the "Motion"), a copy of which is attached hereto as Exhibit "A" and incorporated herein by reference.

PLEASE TAKE FURTHER NOTICE that all creditors and parties-in-interest wishing to object to the Application must file a written objection or other responsive pleading within 21 days from and after the date of this Notice, with the Clerk of the Court, Danny L. Miller, United States Bankruptcy Court, Southern District of Mississippi, Gulfport Division, at Dan M. Russell, Jr., U. S. Courthouse, 2012 - 15th Street, Ste. 244, Gulfport, MS 39501, with a copy to Craig M. Geno, Esq., counsel for the Debtors, at the Law Offices of Craig M. Geno, PLLC, 587 Highland Colony Parkway, Ridgeland, MS 39157.

This, the ______day of August, 2015.

Respectfully submitted,

SLABBED NEW MEDIA, LLC

By Its Attorneys,

LAW OFFICES OF CRAIG M. GENO, PLLC

Bv:

Craig M. Geno



OF COUNSEL:

Craig M. Geno; MSB No. 4793
Jarret P. Nichols; MSB No. 99426
LAW OFFICES OF CRAIG M. GENO, PLLC
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Ridgeland, MS 39157
601-427-0048 - Telephone
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jnichols@cmgenolaw.com

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IN THE UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

SLABBED NEW MEDIA, LLC

Debtor

CHAPTER 11 CASE NO. 15-50963-KMS

MOTION TO EXTEND DEBTOR'S TIME TO REMOVE

<u>CAUSES OF ACTION</u>

COMES NOW Slabbed New Media, LLC, (the "Debtor"), and files this its *Motion to Extend*Debtors Time to Remove Causes of Action (the "Motion"), and in support thereof, would show unto the Court the following, to-wit:

- 1. On June 16, 2015, the Debtor herein filed with this Court its Voluntary Petition for reorganization under Chapter 11 of the Bankruptcy Code.
- 2. In conjunction with this Chapter 11 case, the Debtor is aware that certain pre-petition claims may exist (and possibly post-petition claims as well), either directly or indirectly against the Debtor, that may need to be removed pursuant to Rule 9027 of the Federal Rules of Bankruptcy Procedure.
- 3. In order to fully protect the Debtor's rights regarding all pre-petition causes of action and/or claims (pending as of the filing of this Motion), and/or all post-petition claims, the Debtor respectfully seeks herein to extend the time for removing pre and post-petition causes of action pursuant to Rule 9027 an additional ninety (90) days from August 14, 2015, up to and including November 15, 2015.
- 4. The Motion filed herein is in the best interest of all creditors and parties-in-interest and the extension sought herein is not sought for the purposes of unreasonable delay.
- 5. The Debtor submits that, in light of the relief requested, a Preliminary Order should be entered in the event objections are filed prior to the time a final hearing may be held on this matter.

6. Other grounds to be assigned upon a hearing hereof.

WHEREFORE, the Debtor respectfully prays that upon a hearing hereof, this Honorable Court will grant the Motion and extend the time within which to remove causes of action for ninety (90) days. The Debtor prays for other such general and specific relief as the Court may deem just. This, the _______day of August, 2015.

Respectfully submitted,

SLABBED NEW MEDIA, LLC

By Its Attorneys, LAW OFFICES OF CRAIG M. GENO, PLLC

By: Craig M. Geno

OF COUNSEL:

Craig M. Geno; MSB No. 4793
Jarret P. Nichols; MSB No. 99426
LAW OFFICES OF CRAIG M. GENO, PLLC
587 Highland Colony Parkway
Ridgeland, MS 39157
601-427-0048 - Telephone
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CERTIFICATE OF SERVICE

I, Craig M. Geno, do hereby certify that I have caused to be served this date, via Notice of Electronic Filing, a true and correct copy of the above and foregoing instrument to:

Christopher J. Steiskal, Esq. Office of the United States Trustee christopher.steiskel@usdoj.gov

This, the ______ day of August, 2015.

Craig M. Geno

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Label Matrix for local noticing 0538-6 Case 15-50963-KMS Southern District of Mississippi Gulfport-6 Divisional Office Fri Aug 14 12:55:11 CDT 2015

Chris E. Yount 545 Terrace Street Jefferson, LA 70121-1515

Douglas Handshoe 110 Hall Street Wiggins, MS 39577-2623

Jack E. "Bobby" Truitt
The Truitt Law Firm, LLC
149 North New Hampshire Street
Covington, LA 70433-3235

Trout Point Lodge, Vaughn Perret and Charles Leary 189 Trout Point Road East Kemptville, NS Canada B5A 5X9

United States Trustee 501 East Court Street Suite 6-430 Jackson, MS 39201-5022 Slabbed New Media, LLC Post Office Box 788 Wiggins, MS 39577-0788

Connie S. Montgomery Montgomery Law Center 1403 West Esplanade Avenue Kenner, Louisiana 70065-2850

(p)INTERNAL REVENUE SERVICE CENTRALIZED INSOLVENCY OPERATIONS PO BOX 7346 PHILADELPHIA PA 19101-7346

(p) MISSISSIPPI STATE TAX COMMISSION P O BOX 22808 JACKSON MS 39225-2808

U.S. Securities and Exchange Commission Office of Reorganization 950 East Paces Ferry Road, Suite 900 Atlanta, GA 30326-1382

Craig M. Geno Law Offices of Craig M. Geno, PLLC 587 Highland Colony Pkwy. Ridgeland, MS 39157-8784 U.S. Bankruptcy Court
Dan M. Russell, Jr. U.S. Courthouse
2012 15th Street, Suite 244
Gulfport, MS 39501-2036

Daniel G. Abel Daniel G. Abel, Inc. 2421 Clearview Pwy, Suite 106 Metairie, LA 70001-1239

Internal Revenue Service c/o United States Attorney 1575 20th Avenue, 2nd Floor Gulfport, MS 39501-2040

Tourism Business Solutions 2308 Arnold Street Waveland, MS 39576-2643

U.S. Securities and Exchange Commission c/o United States U.S. Attorney 1575 20th Avenue, 2nd Floor Gulfport, MS 39501-2040

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Internal Revenue Service P.O. Box 21126 Philadelphia, PA 19114

MS State Tax Commission Bankruptcy Section P.O. Box 23338 Jackson, MS 39225 End of Label Matrix
Mailable recipients 16
Bypassed recipients 0
Total 16

